

**WILSON SONSINI GOODRICH & ROSATI**  
Professional Corporation

Attorney for Defendant YouTube LLC

TODD MICHAEL SCHULTZ

**DECLARATION OF CONOR TUCKER**

I, Conor Tucker, declare as follows:

1. I am an attorney at the law firm of Wilson Sonsini Goodrich & Rosati, P.C. (“Wilson Sonsini”), licensed in the State of California, and served as counsel of record for Defendant YouTube LLC in matters related to the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon to do so, I could and would testify competently as to such matters.

2. Attached as Exhibit A is a true and correct copy of an email sent at 12:08pm PT on August 2, 2023, from Todd Schultz to me.

3. Attached as Exhibit B is a true and correct copy of an email sent at 7:16pm PT on November 8, 2023, from Todd Schultz to me.

4. Attached as Exhibit C is a true and correct copy of an email sent at 10:09am PT November 12, 2023, from Todd Schultz to me.

5. Attached as Exhibit D is a true and correct copy of an email sent at 1:52am PT on January 22, 2024, from Todd Schultz to me.

6. Attached as Exhibit E is a true and correct copy of an email sent at 2:27am PT on November 6, 2023, from Todd Schultz to me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 5, 2024, in Los Angeles, California.

/s/ *Conor Tucker*  
Conor Tucker

## Exhibit A

## Tucker, Conor

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**From:** Todd Schultz <toddshultz86@gmail.com>  
**Sent:** Wednesday, August 2, 2023 12:08 PM  
**To:** Tucker, Conor  
**Subject:** Perjury

EXT - [toddshultz86@gmail.com](mailto:toddshultz86@gmail.com)

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You perjured yourself Mr. Tucker. Your characterization of me is a lie. Your statements that "I know my claims are barred by section 230" and that I "artfully" maneuvered it is a lie. You have incriminated your client immeasurably with your declaration and I am personally very upset with the manner you choose to characterize me, which I believe is defamatory.

If I can, I will sue you directly for defamation. I don't know how that relates to litigation from an attorney, but you did defame me, and I am very upset.

Your entire declaration reads like a confession. Your case law is poorly substantiated and you mischaracterize the truth over and over again.

In one of the cases you cited, the decision from the court was that discovery must take place to find out what the defendant knew and when and what they thought.

I hope to see you retract your statements about what I knew or believed, as they are lies.

Todd

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Todd Michael Schultz  
Cell - (310)435-5847  
Home - (310)550-0468

## Exhibit B

## Tucker, Conor

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**From:** Todd Schultz <toddscultz86@gmail.com>  
**Sent:** Wednesday, November 8, 2023 7:16 PM  
**To:** Tucker, Conor  
**Subject:** Bar

EXT - [toddscultz86@gmail.com](mailto:toddscultz86@gmail.com)

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I'm not threatening to report you to the bar, I am going to report you to the bar for violation of rule 11(4)

You violated it and I think a hearing is required.

I never threaten or do things vexatiously. When you tell the truth, you can see others lies clear as day.

"YouTube doesn't condone bullying."

Condone what does that mean? It means allow or permit, per definition.

And yet there's a shit ton of bullying I showed you. And if you had done reasonable inquiry you wouldn't have lied to brazenly. All my sanctions requests were merited, dude. Every one.

Even my RFA was due to the lack of transparency you think you're entitled to. Applicable law is applicable law. Reasonably inquiry. Copyright law. Applicable law. You're hiding the bullying. You know about it and you're either not reasonable inquiry or lying and I'm willing to bet on the latter.

That brief is a big fat lie. You're a liar and you've caused me undue grief. This ain't going away. You did it. You signed a pleading with lies. I can prove it. Can you?

## Exhibit C

**Tucker, Conor**

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**From:** Todd Schultz <toddshultz86@gmail.com>  
**Sent:** Sunday, November 12, 2023 10:09 AM  
**To:** Tucker, Conor  
**Subject:** NORC

EXT - [toddshultz86@gmail.com](mailto:toddshultz86@gmail.com)

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Conor,

I look forward to arbitration before the bar and to no longer working with you in any capacity. Your abusive tactics have caused a lot of duress and you are a liar and what you've filed, is not acceptable. You're going to have back up what you've said. Every bit of it.

I also look forward to dealing with, not just another judge, but another lawyer and perhaps another firm. I'm not going to take the abuse like you think I am. You're gone off this case because you are incapable of good faith dealings.

I will file a declaration iterating that today.

Thank you,  
Todd

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Todd Michael Schultz  
Cell - (310)435-5847  
Home - (310)550-0468



## Exhibit D

**Tucker, Conor**

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**From:** Todd Schultz <toddshultz86@gmail.com>  
**Sent:** Monday, January 22, 2024 1:52 AM  
**To:** Tucker, Conor

EXT - [toddshultz86@gmail.com](mailto:toddshultz86@gmail.com)

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I'm suing you most likely. Big time. What you did is sick. And I'm going to sue you for abetting cyberstalking. You saw the videos. You are a criminal Conor. You're going to have to pay major damages to me for your lies. And your scheming with Whitaker. What the f was that. You can start mediating now if you want but I'm going to seek a judgment against you. You crook.

Todd Michael Schultz  
Cell - (310)435-5847  
Home - (310)550-0468

## Exhibit E

**Tucker, Conor**

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**From:** Todd Schultz <toddshultz86@gmail.com>  
**Sent:** Monday, November 6, 2023 2:27 AM  
**To:** Tucker, Conor  
**Subject:** you and your client are aware of 8th hearing

EXT - [toddshultz86@gmail.com](mailto:toddshultz86@gmail.com)

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Conor,

You have attempted gaslight in order to prevent my story from being iterated without proper deal.  
You are in violation of so many violations I will likely share with the AE.

You ought to be named as accomplice.

You also lied invoking the word 'vexatious' several times. You also lied straight out when you called me vexatious. This makes you sanctionable. This is not appropriate. Drop yourself from the case and have your client engage in settlement discussions, which would benefit them quite a bit. And the judge said to give check the pro se clinic, yet you insinuated it was strick advice.

You lied. You are a liar I am looking forward to taking this before a jury. I'll motion to expedite Your client always damages on every single most absent 2 percent or less.

There is something wrong with your responses and it points to "something to hide,"

You can't win this. Too much off abuse, with so many claims.

You ought to be an accomplice or aiding or abetting. You demonstrated the fraud in place.

I told you very minimum settlement. I'm going to crush you in court. You have no case.  
I hope you are disbarred for unethical conduct.

I will not struggle or litigate this matter. Google will likely have to restructure.

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Todd Michael Schultz  
Cell - (310)435-5847  
Home - (310)550-0468